

Dear Commission:  
in. re.: 02-98

1) Making amateur use primary in the 2400-2402 band is an important signal, stabilizing the future of amateur satellite activity. This provides a measure of certainty in the FCC's intention with respect to amateur radio. One hopes equipment manufacturers will feel sufficiently secure in producing commercial solutions which will in whole, or part, enable and encourage satellite activity, and experimentation.

2) With respect to your proposed 5.25-5.4 MHz band. This is a most welcome band, particularly in the downward portion of the solar cycle.

The topic of sub-bands has been hotly debated within amateur electronic media, and I've had considerable time to contemplate the impact of your decision there. I oppose them, with two caveats, one pro-forma, the other substantive:

A) I advocate development of a band-plan by the ARRL, in lieu of legislated by-mode usage. We are presently seeing interference and channel-contention with digital modes on existing bands, the origin of which is a legacy bandplan-utilization scheme. This needs to be fixed, and future flexibility assured.

The implement 5MHz solution could become a prototype for cleanup of other bands.

B) Bandplanning should segregate by bandwidth, not by mode. In the past, mode specific sub-bands have separated signals of different, known bandwidths. However, contemporary digital modes exhibit both very narrow (psk31) and very broad (pactorIII) characteristics. The rate of innovation is expected to increase, and the need for future change to accomodate innovation is essential to the mission of the amateur service.

Therefore, I suggest that the Commission NOT define sub-bands. Instead, that you refer bandplanning to the ARRL, suggesting development of a bandwidth-based, future-flexible solution, and a process which could be applied to redefined bandplans/sub-band allocations on existing bands in the future.

Thank you for your attention.

Sincerely,  
James Jarvis  
Essex, VT